

Exhibit 4

From: Acacia Dietz
Sent: Wednesday, May 27, 2020 2:48 PM
To: Ken Kim; Barbara Bibas
Cc: iDS_SINKS-02678; ESQ Edward ReBrook
Subject: RE: Production of ESI – BitChute

The mobile data that was retrieved from Mr. Schoep's phone – there are 17 responsive documents that have redactions on them, please produce the redacted responsive documents.

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: [REDACTED]
Email: [REDACTED]

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From: [Ken Kim](#)
Sent: Wednesday, May 27, 2020 2:46 PM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [iDS_SINKS-02678](#); [ESQ Edward ReBrook](#)
Subject: RE: Production of ESI – BitChute

Hi Acacia:

Can you please confirm which data sets we should be producing? Also, can you advise on which data sets have redactions applied?

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Acacia Dietz <[REDACTED]>
Sent: Wednesday, May 27, 2020 2:43 PM
To: Ken Kim <[REDACTED]>; Barbara Bibas <[REDACTED]>
Cc: IDS_SINKS-02678 <ids_sinks-02678@idsinc.com>; ESQ Edward ReBrook <[REDACTED]>
Subject: RE: Production of ESI – BitChute

[EXTERNAL SENDER]

Please produce to plaintiffs all responsive documents with redactions thank you

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: [REDACTED]
Email: [REDACTED]

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From: Acacia Dietz <[REDACTED]>
Sent: Monday, May 18, 2020 10:31:31 PM
To: Ken Kim <[REDACTED]>; Barbara Bibas <[REDACTED]>
Cc: IDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: RE: Production of ESI – BitChute

Ken –
I apologize but I did not receive any email regarding the @jeffschoep Twitter account. Can you please send me the email again? Thankyou

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: [REDACTED]
Email: [REDACTED]

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From: [Ken Kim](#)
Sent: Monday, May 18, 2020 10:08 PM

To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [IDS_SINKS-02678](#); [ESQ Edward ReBrook](#)
Subject: RE: Production of ESI – BitChute

Thanks for confirming, Acacia. We will have the 45 total hits+fam promoted for your review and let you know. Also, can you please confirm that we can promote the 3 total hits+fam for Mr. Schoep's Twitter collection [REDACTED] that I email you about this morning?

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Acacia Dietz <[REDACTED]>
Sent: Monday, May 18, 2020 9:47 PM
To: Barbara Bibas <[REDACTED]>; Ken Kim <[REDACTED]>
Cc: [IDS_SINKS-02678](#) <[REDACTED]>; [ESQ Edward ReBrook](#) <[REDACTED]>
Subject: Re: Production of ESI – BitChute

[EXTERNAL SENDER]

Ken -

Yes please move everything over to Relativity for our review. Thank you.

Acacia Dietz

The ReBrook Law Office

Phone: [REDACTED]

Email: [REDACTED]

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From: Ken Kim <[REDACTED]>
Sent: Monday, May 18, 2020 9:12:56 PM
To: Acacia Dietz <[REDACTED]>; Barbara Bibas <[REDACTED]>

Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: RE: Production of ESI – BitChute

Hi Acacia:

Here is a summary of the STR results for Mr. Schoep's mobile collection data imaged last week:

Documents in Searchable Set	Total Documents with Hits	Total Documents with Hits, including Family	Total Documents without Hits
131	21	45	86

Please note that all 327 search terms were applied to this collection. The STR is attached above for your review. Please confirm we can promote the 45 documents to Relativity for your review.

Thank you,

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Ken Kim
Sent: Sunday, May 17, 2020 6:16 PM
To: Acacia Dietz <[REDACTED]>; Barbara Bibas <[REDACTED]>
Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: RE: Production of ESI – BitChute

Hi Acacia:

We should have the mobile data ready for your review sometime early this week on Monday or Tuesday. We will let you know.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Acacia Dietz <[REDACTED]>
Sent: Saturday, May 16, 2020 4:50 PM
To: Barbara Bibas <[REDACTED]>; Ken Kim <[REDACTED]>
Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: Re: Production of ESI – BitChute

[EXTERNAL SENDER]

Please let me know when the data from Mr. Schoep's phone is complete and ready for review in Relativity.
Thank you

Acacia Dietz

The ReBrook Law Office

Phone: [REDACTED]

Email: [REDACTED]

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From: Acacia Dietz <[REDACTED]>
Sent: Friday, May 15, 2020 2:57:10 PM
To: Barbara Bibas <[REDACTED]>; Ken Kim <[REDACTED]>
Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: Re: Production of ESI – BitChute

Thank you for the update.

Acacia Dietz

The ReBrook Law Office

Phone: [REDACTED]

Email: [REDACTED]

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From: Ken Kim <[REDACTED]>

Sent: Friday, May 15, 2020 1:42:51 PM

To: Acacia Dietz <[REDACTED]>; Barbara Bibas <[REDACTED]>

Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>

Subject: RE: Production of ESI – BitChute

Hi Acacia:

We have completed imaging Mr. Schoep's mobile device and will be shipping the device out today for Monday (5f18) delivery to the below address:

[REDACTED]

The tracking number for this shipment is: [REDACTED].

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Acacia Dietz <[REDACTED]>

Sent: Thursday, May 14, 2020 11:08 PM

To: Barbara Bibas <[REDACTED]>; Ken Kim <[REDACTED]>

Cc: iDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>

Subject: Re: Production of ESI – BitChute

[EXTERNAL SENDER]

The address is correct.

Acacia Dietz

The ReBrook Law Office

Phone: [REDACTED]

Email: [REDACTED]

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From: Ken Kim <[REDACTED]>
Sent: Thursday, May 14, 2020 11:06:35 PM
To: Barbara Bibas <[REDACTED]>; Acacia Dietz <[REDACTED]>
Cc: IDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: Re: Production of ESI – BitChute

Hi Acacia:

Can you please confirm return shipping address for Mr Schoep's phone is as follows?

[REDACTED]

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]

Sent from a mobile device. Please excuse brevity and typos.

From: Acacia Dietz <[REDACTED]>
Sent: Thursday, May 14, 2020 6:14:59 PM
To: Ken Kim <[REDACTED]>; Barbara Bibas <[REDACTED]>
Cc: IDS_SINKS-02678 <[REDACTED]>; ESQ Edward ReBrook <[REDACTED]>
Subject: Re: Production of ESI – BitChute

[EXTERNAL SENDER]

Thank you for the update.

Acacia Dietz

The ReBrook Law Office

Phone: [REDACTED]

Email: [REDACTED]

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From: Ken Kim <[REDACTED]>
Sent: Tuesday, May 12, 2020 7:55:58 PM
To: Acacia Dietz <[REDACTED]>
Cc: iDS_SINKS-02678 [REDACTED]>
Subject: RE: Production of ESI – BitChute

Hi Acacia:

We have not yet received delivery of Mr. Schoep's mobile device. Just checked the tracking number that you provided and the current status shows that the package is in transit to next facility (was in Detroit yesterday). We will let you know as soon as we are in receipt.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: [REDACTED]



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From: Acacia Dietz <[REDACTED]>
Sent: Tuesday, May 12, 2020 7:41 PM **To:**
Ken Kim <[REDACTED]> **Subject:** RE:
Production of ESI – BitChute

[EXTERNAL SENDER]

Ken –
Thank you. I was just checking to see if there was any update regarding the receipt of Mr. Schoep's phone?
Thank you,

ACACIA DIETZ
Legal Assistant

THE REBROOK LAW OFFICE

Phone: [REDACTED]

Email: [REDACTED]

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From: Ken Kim <[REDACTED]>
Sent: Saturday, May 9, 2020 6:17:21 AM
To: Acacia Dietz <[REDACTED]>; Barbara Bibas <[REDACTED]>
Cc: Edward ReBrook, ESQ <[REDACTED]>; IDS_SINKS-02678 <[REDACTED]>
Subject: Re: Production of ESI – BitChute

Thanks for the information, Acacia. We will let you know once we are in receipt of the device.

Regards,
Ken

From: Acacia Dietz <[REDACTED]>
Sent: Friday, May 8, 2020, 11:21 PM
To: Ken Kim; Barbara Bibas
Cc: Edward ReBrook, ESQ; IDS_SINKS-02678
Subject: RE: Production of ESI – BitChute

[EXTERNAL SENDER]

Ken & Barbara,

Mr. Schoep's iPhone was sent today by USPS. Tracking #: [REDACTED]
Please notify us when you receive it. Thank you.

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: [REDACTED]
Email: [REDACTED]

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